

1<sup>st</sup> February 2024

Our ref:

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Dear Sir/Madam,

**RE: RUGBY LOCAL PLAN ISSUES AND OPTIONS CONSULTATION RESPONSE – LAND SOUTH OF ASHLAWN ROAD AND LAND AT GORSE FARM, RUGBY**

Sworders are instructed by our clients, Ashlawn Investments, to prepare and submit a response to the current consultation on the draft Issues and Options document.

Ashlawn Investments owns land to the south of Ashlawn Road at Ashlawn House and land at Gorse Farm; please see enclosed plans of both sites, both of which lie to the south of Ashlawn Road. A Call for Sites submission for each of these sites has been prepared and is being submitted alongside this consultation response.

We wish to respond only to those consultation questions which are of relevance to the potential development of our clients' sites for residential development.

**Question 22: Should we identify priority locations or allocate sites for BNG for sites which are unable to provide all the net gain on site, and if so, where?**

We consider that the LPA should proactively identify sites for BNG so that if a developer is unable to meet their BNG requirement onsite, they have options to agree offsite delivery on local sites in the Borough. The scope of the Call for Sites should be extended to specifically request submissions of land to be considered for BNG uplift.

**Question 24: Should we require developers to prioritise the delivery of BNG within close proximity to the development?**

The DEFRA metric already effectively strongly encourages this, because it attributes a higher number of credits to sites which are closer to the development site, so the incentive for developers to deliver BNG either onsite or as close to the site as possible is already in place. The current structure of BNG credits which gives most credits to the delivery of BNG within the same Borough/District or Landscape



Character Area as the proposed development already provides a clear structure which is well understood and is consistent across England.

**Question 25: We are considering all new residential developments should be net zero. Do you agree?**

We support the principle of the introduction of policies in the Plan which address climate change and seek to reduce carbon emissions. However, we also note the acknowledgement in the draft Plan that such a policy would increase build costs. There are currently no documents in the published evidence base which provide a viability assessment to supply the details.

Before the next consultation on the draft Local Plan, we request that the LPA publishes a detailed viability assessment of whether the cumulative impact of all the requirements potentially being placed on developers (including proposals for net zero build, full accessibility for 10% of new homes, Biodiversity Net Gain uplift, Community Infrastructure Levy and site specific S106 requirements), does in principle still enable viable development to be delivered, with an appropriate return to a developer. Only then can we answer this question with any real knowledge of the full picture, and whether net zero is a viable option.

**Question 31: How many homes should we be planning for?**

- a) **Minimum local housing need**
- b) **HEDNA 2022**
- c) **Other**

We consider that the housing requirement in the Plan should be based on the HEDNA 2022. This is because the HEDNA methodology more accurately reflects the census based demographic projections for Coventry, whereas the Standard Method is based on 2014 projections for Coventry, which have historically been over-estimated by the ONS. The overestimate of population projections has been acknowledged by the ONS and is considered to justify the exceptional circumstances to diverge from using the Standard Method to calculate housing need.

The HEDNA has therefore, remodelled the demographic projections based on 2021 census results and has applied the standard methodology framework to these results.

The trend based HEDNA methodology results in an overall reduction in housing need across the HMA; that reduction largely relates to Coventry. However, the methodology results in an uplift for Rugby Borough, from 516 new homes under the 2014 projections, to 735 new homes. Under the HEDNA methodology, an additional 3,114 new homes would be required in the Borough to 2041, or an additional 8,101 to 2050.

Given that the adopted Rugby Local Plan already makes provision for 620 new homes per annum, and that between 2011 and 2023 an average of 673 new homes were delivered annually, it would seem realistic and achievable for the new Local Plan to allocate sites to deliver 735 new homes per year, to support the Government's stated objective to significantly boost the supply of new homes.



Paragraph 82 of the NPPF notes that:

*'Planning policies should*

*d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.'*

The adopted Rugby Local Plan provides a pipeline of new homes primarily through the allocation of two large, strategic sites; 4,766 new homes at SW Rugby SUE, and a further 4,603 new homes at Houlton. We note the recent article in Warwickshire World newspapers, dated 3<sup>rd</sup> January 2024, which identified that the costs associated with the infrastructure provision for 5,000 new homes at Rugby SW SUE has increased by more than half the original estimate, to £53m.

To give the new Plan the flexibility that the NPPF requires, these strategic allocations, with their significant costs and lead in times, should be complemented by the allocation of a range of more modest sites, which require less infrastructure, and are deliverable in a shorter timeframe, but which together can deliver the houses required.

Sites which complement the SUE approach should also be in sustainable locations, potentially making use of and contributing to the facilities and sustainable transport provided through the delivery of nearby SUEs.

**Question 33: Please provide any comments you have on the suitability of any of the broad locations listed above for new housing. Are there any locations that we have missed?**

We note that further housing is expected to be planned at the SW Rugby SUE and would support this approach. 860 new homes and a primary school are being delivered to the north of Ashlawn Road as part of the SUE, and some homes are already occupied. Our client's land to the south of Ashlawn Road provides a natural extension to the development to the north.

The principle of residential development to the south of Ashlawn Road has also already been established through existing houses in this location, and more recently, through the granting of planning permission at Gorse Farm for 10 new homes, and through the recently approved development at Inwoods House for 25 units.

Our client's sites lie to the south of Ashlawn Road. The residential development of these sites would complement the surrounding residential schemes which have the benefit of planning permission, by providing further, modest developments which could be delivered quickly, with the need for minimal infrastructure and with minimal impact on the Rainsbrook Valley.

Land at Ashlawn Road could be linked to the SUE development by a pedestrian and cycle crossing across Ashlawn Road, which would enable residents of the new development to attend the planned primary school, and to walk or cycle to this school and Ashlawn School or Rugby Free School.



Development of the sites would provide a landscaped, parkland feel suitable for high quality developments which have excellent access to all the services, facilities and employment opportunities in Rugby.

**Question 37: Do you support our intentions to bolster our policies on sustainable travel?**

The Council's intentions to bolster policies on sustainable travel are supported. We note the recent introduction of a bus service along Ashlawn Road, (Service 8a) and would strongly encourage further initiatives to deliver sustainable travel from the Ashlawn Road area to the town centre, the railway station, shops and employment sites. Allocating sites such as Land south of Ashlawn Road and Land at Gorse Farm, which lie in relatively sustainable locations, provides an opportunity to create a critical mass of population along a key road in the town, which would increase the viability of bus services.

Similarly, the recent addition of a cycle way along Ashlawn Road is welcomed, and we would encourage the LPA to work with the County Council in its role as Highways Authority and with the CTC, Sustrans and other sustainable transport groups to deliver a dense network of cycle and footways around Rugby which offer a feasible alternative to use of the private car.

**Summary**

Our clients' sites at Gorse Farm and at Ashlawn Road would provide modest sized developments which could be delivered quickly and without the need for significant infrastructure provision. As such, their allocation in the draft Local Plan would complement the Council's existing strategy of delivering significant numbers of housing in Sustainable Urban Extensions. Neither site has any planning or environmental constraints and both are deliverable and achievable.

I would be grateful if you would acknowledge safe and timely receipt of these representations. If you would like any further information, please don't hesitate to contact us.

Regards,